

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

KIRA WAHLSTROM,

Plaintiff,

v.

C.A. NO. 1:22-cv-10792-RGS

DAVID J. HOEY, LAW OFFICES OF
DAVID J. HOEY, P.C., DON C. KEENAN,
D.C. KEENAN & ASSOCIATES, P.C. d/b/a
THE KEENAN LAW FIRM, P.C., AND
KEENAN'S KIDS FOUNDATION, INC.,

Defendants.

KEENAN'S KIDS FOUNDATION, INC.'S RULE 7.1 STATEMENT

Pursuant to Federal Rule of Civil Procedure 7.1 and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualifications or recusal, Defendant Keenan's Kids Foundation, Inc. hereby discloses that it has no parent corporation, and no publicly held corporation owns 10% or more of its stock.

Dated: October 14, 2022

Respectfully submitted:

/s/ Danni L. Shanel

William M. Taylor, Esq. (Bar No. 624981)

Danni L. Shanel, Esq. (Bar No. 710378)

John M. Bowler (*pro hac vice motion to be filed*)

Lindsay Mitchell Henner (*pro hac vice motion to be filed*)

TROUTMAN PEPPER

HAMILTON SANDERS LLP

125 High Street, 19th Floor

Boston, MA 02110

Telephone: (617) 204-5100

William.Taylor@troutman.com

Danni.Shanel@troutman.com
John.Bowler@troutman.com
Lindsay.henner@troutman.com
Attorneys for Keenan's Kids Foundation

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 14, 2022, a true copy of the foregoing Opposition to Plaintiff's Motion to Dismiss or Remand was served on all registered participants via ECF, and served via First Class Mail upon:

Bridget A. Zerner
John J.E. Markham , II
Markham Read Zerner LLC
One Commercial Wharf West
Boston, MA 02110
617-523-6329
Fax: 617-742-8604
bzerner@markhamreadzerner.com
jmarkham@markhamreadzerner.com

Attorneys for Plaintiff Kira Wahlstrom

Susan M. Silva
John J. O'Connor
Peabody & Arnold LLP
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02210-2261
(617) 951-2100
ssilva@peabodyarnold.com
joconnor@peabodyarnold.com

*Attorneys for Defendant Don C. Keenan,
and D.C. Keenan & Associates, P.C.*

Christine A. Knipper
Thomas A. Murphy
Wilson Elser Moskowitz Edelman & Dicker,
LLP
260 Franklin Street
14th Floor
Boston, MA 02110-3112
617-422-5300
Fax: 617-423-6917
christine.knipper@wilsonelser.com
thomas.murphy@wilsonelser.com

*Attorneys for Defendant David J. Hoey and
Law Offices of David J. Hoey*

Date: October 14, 2022

/s/ Danni L. Shanel
Danni L. Shanel